

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

)  
JOSEPH SHOEMAKER, )  
RICHARD GINDIN, DEMYA )  
JOHNSON, KIMBERLY )  
STARLING, And MATTHEW )  
MCCORMICK, individually and )  
on behalf of all others similarly )  
situated, )  
)  
Plaintiffs, )  
)  
v. ) Civil No. 1:21-cv-01668-CCC  
)  
RICHARD ZEITLIN, )  
AMERICAN TECHNOLOGY )  
SERVICES, LLC, UNIFIED )  
DATA SERVICES, LLC, )  
COMPLIANCE )  
CONSULTANTS, LLC, WIRED )  
4 DATA, LLC, and JOHN DOES )  
1-10, corporate entities and )  
individuals presently unknown, )  
)  
Defendants. )  
)

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**SUPPLEMENTARY DECLARATION OF  
DEFENDANT RICHARD ZEITLIN IN SUPPORT  
OF DEFENDANTS' RULE 12(b)(2) MOTION TO  
DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Richard Zeitlin, hereby declare under penalty of perjury that:

1. I am a Defendant in the above-referenced matter.
2. I have personal knowledge of the facts set forth in this Declaration and if called upon to testify, could do so competently.
3. I am neither an owner nor an officer of Wired 4 Data, LLC and never have been.
4. This declaration is offered in support of Defendants' Rule 12(b)(2) motion challenging this Court's personal jurisdiction and is not intended to convert Defendants' Rule 12(b)(6) motion to dismiss for failure to state a claim to a Rule 56 motion for summary judgment.

Pursuant to 28 U.S.C. ¶ 1746, I declare under penalty of perjury the foregoing is true and correct to the best of my information, knowledge, and belief.

Dated: January 18, 2022.



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Richard Zeitlin